

CHRISTOPHER MADIOU

WOOLWORTH BUILDING
233 BROADWAY – SUITE 2208
NEW YORK, NY 10279

P (917) 408 - 6484
F (212) 571 - 9149
CHRIS@MADIOULAW.COM

WWW.MADIOULAW.COM

March 16, 2020

The Honorable Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007
By ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: March 17, 2020

Re: *United States v. Dimitrius Simmons*, 19 Cr. 58 (LGS)

Dear Judge Schofield,

I represent Dimitrius Simmons in the above-captioned case. I write with consent from the government to request an adjournment of Mr. Simmons' sentencing for at least sixty (60) days; Mr. Simmons is currently scheduled to be sentenced on March 26, 2020 at 11:00am.

Mr. Simmons has been released on bail conditions since his arrest without issue. Last week, I filed Mr. Simmons' written sentencing submission along with a video sentencing submission. The government has informed me that they will be filing their submission this week, as scheduled. We ask for this adjournment in light of the current COVID-19 pandemic and the myriad difficulties associated with preparing for a criminal sentencing at this time. Mr. Simmons is the primary caregiver to his two daughters while his partner is still at work serving New York City's homeless population. The requested adjournment will allow counsel to adequately prepare with Mr. Simmons for the final phase of his sentencing as well as allow Mr. Simmons time to prepare with his family for the difficulties ahead.

Therefore, I respectfully request that the Court adjourn Mr. Simmons' sentencing for at least sixty (60) days from March 26, 2020 to adequately assure effective assistance at sentencing.

Thank you in advance for your consideration.

Sincerely,

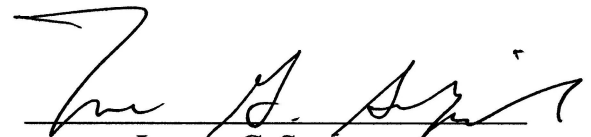


Christopher Madiou

Application Granted. Defendant Simmons' sentencing hearing is adjourned to May 28, 2020 at 2:00 p.m. The Clerk of the Court is directed to terminate the letter motion at docket number 99.

Dated: March 17, 2020
New York, New York

cc: Christopher Clore
Assistant United States Attorney (by ECF)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE